

*Weaver v. GFS Transport, LLC*

# EXHIBIT A

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOURTH JUDICIAL CIRCUIT
COUNTY OF CHESTERFIELD	)	
	)	
MATTHEW WEAVER,	)	
	)	<b>SUMMONS</b>
Plaintiff,	)	
v.	)	
	)	
GFS TRANSPORT, LLC,	)	
	)	
<u>Defendant.</u>	)	

TO THE DEFENDANT NAMED HEREIN:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is hereby served upon you, and to serve a copy of your Answer to the said Complaint on the subscriber at his office, 129 S. Coit Street, Florence, South Carolina 29501, within thirty (30) days after the service thereof, exclusive of the date of such service and if you fail to answer, appear or defend, judgment by default will be rendered against you for the relief demanded in this Complaint.

s/Matthew S. Swilley  
 Matthew S. Swilley  
 Attorney for Plaintiff  
 Swilley Law Firm, LLC  
 129 S. Coit Street  
 Florence, SC 29501  
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Florence, South Carolina

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOURTH JUDICIAL CIRCUIT
COUNTY OF CHESTERFIELD	)	
	)	
MATTHEW WEAVER,	)	
	)	<b>COMPLAINT</b>
Plaintiff,	)	(Jury Trial Demanded)
v.	)	
	)	
GFS TRANSPORT, LLC,	)	
	)	
<u>Defendant.</u>	)	

The Plaintiff, complaining of the above-named Defendant, would respectfully show unto this Honorable Court that:

1. The Plaintiff is a citizen and resident of Chesterfield County, State of South Carolina.
2. The Defendant, upon information and belief is a Limited Liability Company organized and existing under the laws of the State of Michigan. The Defendant conducts business within the State of South Carolina.
3. At all times herein, Steven Gregory Cox was an agent and employee of the Defendant and was acting within the course and scope of his employment with the Defendant.
4. Venue for this action is proper in Chesterfield County pursuant to S.C. Code § 15-7-30, as Defendant's business operations occur in Chesterfield County and the actions and omissions giving rise to the cause of action set forth herein occurred in Chesterfield County.
5. On or about February 1, 2022, at approximately 11:30 A.M. the Plaintiff was driving eastbound on Manor Road near the Town of Cheraw. Cox, while driving a tractor-trailer truck owned by the Defendant was attempting to improperly back out of a private driveway into another private driveway on the opposite side of Manor Road and caused a collision between his vehicle and the Plaintiff's vehicle.

6. As a result of the aforementioned collision, Plaintiff suffered injury to his back, left shoulder, and left hip and also suffered damage to personal property. The aforementioned injuries to Plaintiffs and damage to property resulting from the collision have caused and will continue to cause the Plaintiff to spend money on medical expenses and mileage as well as repairs and replacements to damaged property. The aforementioned injuries to the Plaintiff have also caused and will continue to cause Plaintiff to endure much pain, suffering, loss of enjoyment of life, alteration of lifestyle, lost wages, mental anguish, emotional distress, inconvenience and may cause the Plaintiff to be permanently injured.
7. The Defendant, by and through its agent Steven Gregory Cox, was negligent, grossly negligent, careless, reckless, willful, and wanton in the following particulars:
  - a. In backing improperly in violation of S.C. Code § 56-5-3810;
  - b. In failing to keep his vehicle under proper control;
  - c. In failing to maintain a proper lookout;
  - d. In failing to properly apply his brakes, if any the vehicle had;
  - e. In driving too fast for conditions in violation of S.C. Code § 56-5-1520;
  - f. In failing to pay attention to the road ahead;
  - g. In other and further such particulars as the evidence may show.

All of which are the direct and proximate cause of the damages suffered by the Plaintiff herein. Said acts being in violation of the S.C. Code of Laws and the Common Law of the State of South Carolina.

8. The Plaintiff is informed and believes that he is entitled to judgment against the Defendant for an appropriate amount of actual, consequential and punitive damages.

Wherefore, having fully set forth his Complaint herein, the Plaintiff prays for judgment against the Defendant for actual damages, consequential damages and punitive damages, for the costs of this action, and for such other and further relief as this Court deems just and proper.

Respectfully Submitted,

s/Matthew S. Swilley

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